



INVOICE

MMIC GROUP
ATTN: SUSAN J. RILEY
7701 FRANCE AVENUE SOUTH, SUITE 500
MINNEAPOLIS, MN 55435-5288

FILE NUMBER: 50016-01369

SEPTEMBER 27, 2012

RE: JANE DOE, ET AL VS. DR. ALBERT TSAI, ET AL
CLAIM NUMBER: 115566-1
INSURED: DR. ALBERT TSAI
CLAIMANT: JANES DOE, ET AL

| | |
|--|-------------------|
| FEES FOR PROFESSIONAL SERVICES THROUGH 9/27/2012 | \$7,500.00 |
| EXPENSES ADVANCED THROUGH 09/27/2012 | \$113.90 |
| TOTAL THIS INVOICE | <u>\$7,613.90</u> |

PLEASE SEND REMITTANCE TO:

Meagher & Geer P.L.L.P
Attn: Accounting Department
33 South Sixth Street
Suite 4400
Minneapolis, MN 55402
USA
FED I.D. #41-0726610
Telephone (612) 338-0661

INVOICE IS PAYABLE UPON RECEIPT

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BAZ

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Page 2

RE: JANE DOE, ET AL VS. DR. ALBERT TSAI, ET AL

| Date | Initials | Description | Hours | Amount |
|---------|----------|--|-------|----------|
| 1/17/12 | BAZ | Listen to message from Judge Reilly's clerk re: denial of stay request. | 0.10 | \$25.00 |
| 1/17/12 | BAZ | Telephone call with KAB and Jill Clark re: her request for stay of execution of judgment. | 0.10 | \$25.00 |
| 1/17/12 | KAM | Review and analyze appellants' motion to vacate the judgment. | 0.20 | \$50.00 |
| 1/17/12 | KAM | Review and analyze rules and caselaw re: vacating judgments based on fraud allegation more than one year after judgment entered. | 1.20 | \$300.00 |
| 1/17/12 | KAM | Conference with Sue Riley re: how we intend to oppose motion to vacate and to enforce fees. | 0.20 | \$50.00 |
| 1/17/12 | KAM | Telephone conference with Jill Clark in which she asks whether we will agree to stay enforcement proceedings. | 0.10 | \$25.00 |
| 1/18/12 | KAM | Review and analyze documents from Hennepin County re: plaintiff's ex parte motions and court's denial of same. | 0.60 | \$150.00 |
| 1/18/12 | KAM | Telephone conversation with judge's clerk re: court record | 0.20 | \$50.00 |
| 1/18/12 | KAM | Write to appellants' counsel asking her to provide her proposed briefing schedule by Thursday | 0.10 | \$25.00 |
| 1/18/12 | KAM | Write to plaintiff's counsel asking re: information that we learned about her client's ex parte motions | 0.20 | \$50.00 |
| 1/19/12 | BAZ | Phone conference with defense counsel re: Rule 11 sanctions motion and proposed briefing schedule on plaintiffs' Rule 60 Motion. | 0.20 | \$50.00 |
| 1/19/12 | KAM | Review and analyze multiple emails from plaintiff re: briefing schedule. | 0.30 | \$75.00 |

continued on next page

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Page 3

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| Date | Initials | Description | Hours | Amount |
|-------------|-----------------|---|--------------|---------------|
| 1/19/12 | KAM | Write to co-defendants to map out our plan for addressing briefing schedule and my accompanying affidavit to advise court what Jill Clark has been saying and doing. | 0.30 | \$75.00 |
| 1/19/12 | KAM | Telephone conference with do-defendants to determine how proceed in light of plaintiffs' counsels remarks and how to comply with court's order to propose briefing schedule | 0.50 | \$125.00 |
| 1/20/12 | BAZ | Edit supporting Affidavit and letter to court re: Rule 60 Motion and briefing schedule. | 0.50 | \$125.00 |
| 1/20/12 | KAM | Write 8-page affidavit detailing history of conduct by plaintiffs' counsel and locating and attaching all documents documenting that conduct and history | 4.80 | \$1,200.00 |
| 1/20/12 | KAM | Write letter to Judge setting out briefing schedule and explaining attached affidavit. | 0.40 | \$100.00 |
| 1/20/12 | KAM | Draft detailed Rule 11 motion for sanctions. | 1.20 | \$300.00 |
| 1/20/12 | KAM | Draft letter to Jill Clark serving her with Rule 11 motion. | 0.10 | \$25.00 |
| 1/20/12 | KAM | Review and analyze caselaw setting out standards for asserting Rule 11 violation for use in motion. | 0.60 | \$150.00 |
| 2/10/12 | KAM | Begin drafting memorandum of law in support of motion for Rule 11 sanctions. | 0.90 | \$225.00 |
| 2/14/12 | KAM | Write memorandum of law in support of Rule 11 sanctions motion. | 3.30 | \$825.00 |
| 2/14/12 | KAM | Write proposed order. | 0.30 | \$75.00 |
| 2/16/12 | KAM | Correspond with court re: hearing sanctions motion on briefs | 0.10 | \$25.00 |
| 2/17/12 | KAM | Review and analyze letter from Jill Clark's office | 0.10 | \$25.00 |

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Page 4

RE: JANE DOE, ET AL VS. DR. ALBERT TSAI, ET AL

| Date | Initials | Description | Hours | Amount |
|-------------|-----------------|--|--------------|---------------|
| 2/17/12 | KAM | Discuss latest letter and how to respond with co-defense counsel | 0.10 | \$25.00 |
| 2/20/12 | KAM | Write letter to Judge Frank objecting to plaintiffs' request for an indefinite extension. | 1.10 | \$275.00 |
| 2/21/12 | BAZ | Propose edits to letter of objection to Judge Frank re: plaintiff's request for extension. | 0.20 | \$50.00 |
| 2/21/12 | BAZ | Read co-defendant, HCMC's letter of objection to court re: plaintiff's extension request. | 0.20 | \$50.00 |
| 2/21/12 | KAM | Review and analyze court of appeals files which reveal that plaintiffs' counsel has not been out on medical leave | 1.10 | \$275.00 |
| 2/21/12 | KAM | Write letter and affidavit for filing with Judge Frank establishing that Jill Clark was not candid with the court about her medical leave. | 0.80 | \$200.00 |
| 3/15/12 | KAM | Telephone conversations with judge's clerk re: moving forward with sanctions motion | 0.10 | \$25.00 |
| 4/2/12 | BAZ | Read Judge Frank's Order denying plaintiffs' motion to vacate and extending time for briefing motion for sanctions. | 0.30 | \$75.00 |
| 4/13/12 | BAZ | Confirm no electronic or mail filing by plaintiffs re: pending sanctions motion requested by defendants. | 0.20 | \$50.00 |
| 4/13/12 | BAZ | Edit letter to Judge Frank re: above and asking for final relief. | 0.40 | \$100.00 |
| 4/13/12 | KAM | Write letter to court explaining why it should rule on sanctions motion and why plaintiffs should be precluded from taking any further action. | 1.10 | \$275.00 |
| 5/25/12 | KAM | Draft letter to judge re: sanctions motion | 0.90 | \$225.00 |
| 6/1/12 | BAZ | Read plaintiff's e-mail re: expected submission to court re: sanctions motion. | 0.10 | \$25.00 |

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Page 5

RE: JANE DOE, ET AL VS. DR. ALBERT TSAI, ET AL

| Date | Initials | Description | Hours | Amount |
|-------------------|----------|---|-------|-------------------|
| 6/6/12 | BAZ | Read plaintiffs' submissions to Judge Frank re: pleading motions to reopen case and vacate judgment and in response to defendants' motions for sanctions. | 1.50 | \$375.00 |
| 6/6/12 | KAM | Conference with judge's clerk to determine if response needed to plaintiffs' counsel's submissions. | 0.10 | \$25.00 |
| 6/8/12 | BAZ | Read e-mail from Judge Frank's clerk re: plaintiffs' submissions to court (letter) and schedule for response; e-mail to Sue Riley re: same. | 0.20 | \$50.00 |
| 6/8/12 | BAZ | Telephone call to Brenda Schaffer to inquire re: above. | 0.10 | \$25.00 |
| 6/8/12 | BAZ | E-mail correspondence to Brenda Schaffer re: above. | 0.10 | \$25.00 |
| 6/12/12 | BAZ | E-mail correspondence with court and parties re: filings or court submissions. | 0.20 | \$50.00 |
| 6/18/12 | KAM | Review and analyze plaintiffs' counsel's 34 page letter to judge for purposes of responding to it as ordered by the court. | 0.90 | \$225.00 |
| 6/18/12 | KAM | Write response to plaintiffs' letter as ordered by court. | 1.90 | \$475.00 |
| 7/9/12 | KAM | Review and analyze 4-page letter and motion to intervene sent by Pauline Thomas to Judge Frank. | 0.70 | \$175.00 |
| 8/7/12 | KAM | Review and analyze court's order. | 0.10 | \$25.00 |
| 8/29/12 | KAM | Draft letter to court in response to Jill Clark's email requesting extension and accommodation. | 0.80 | \$200.00 |
| 9/25/12 | KAM | Review and analyze court's sanction order. | 0.20 | \$50.00 |
| TOTAL FEES | | | | \$7,500.00 |

| Date | Description | Quantity | Rate | Amount |
|---------|---|----------|--------|--------|
| 1/20/12 | PHOTOCOPIES - E101 [E101 Correspondence - | 68.00 | \$0.10 | \$6.80 |

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Page 6

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| Date | Description | Quantity | Rate | Amount |
|-----------------------|--|-----------------|-------------|------------------|
| 1/23/12 | MESSENGER EXPENSE - E107 [E107] - METRO LEGAL SERVICES, INC | 1.00 | \$96.00 | \$96.00 |
| 2/15/12 | PHOTOCOPIES - E101 [E101 Pleadings - MOTION | 38.00 | \$0.10 | \$3.80 |
| 2/15/12 | PHOTOCOPIES - E101 [E101 Correspondence - LTR | 52.00 | \$0.10 | \$5.20 |
| 2/20/12 | PHOTOCOPIES - E101 [E101 Correspondence - | 15.00 | \$0.10 | \$1.50 |
| 4/13/12 | PHOTOCOPIES - E101 [E101 Correspondence - LTR | 6.00 | \$0.10 | \$0.60 |
| TOTAL EXPENSES | | | | \$ 113.90 |

TOTAL FEES PLUS EXPENSES

\$7,613.90

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MINNEAPOLIS, MN 55435-5288

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INSURED: DR. ALBERT TSAI
CLAIMANT: JANES DOE, ET AL

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EXPENSES ADVANCED THROUGH 09/27/2012

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\$113.90

TOTAL THIS INVOICE

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